

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	(	<b>Bankruptcy No. 17-23925-TPA</b>
	(	
<b>JOHNSON, RONALD A</b>	(	
	(	<b>Adversary No. 19-02144-TPA</b>
<b>Debtors</b>	(	
	(	<b>Chapter 7</b>
<b>ROSEMARY C. CRAWFORD, Trustee</b>	(	
<b>for the Bankruptcy Estate of</b>	(	<b>Doc. No.</b>
<b>RONALD A. JOHNSON,</b>	(	
	(	
<b>Plaintiff,</b>	(	
<b>vs.</b>	(	
	(	
<b>RONALD A. JOHNSON,</b>	(	
<b>ERICA FRASER-JOHNSON,</b>	(	
<b>Commonwealth of Pennsylvania</b>	(	
<b>Department of Revenue, US Department</b>	(	
<b>of Treasury, New York State Attorney</b>	(	
<b>General's Office, Wells Fargo Home</b>	(	
<b>Mortgage, New York State Department</b>	(	
<b>of Taxation &amp; Finance, and NYC</b>	(	
<b>Department Environmental Control</b>	(	
<b>Board,</b>	(	
	(	
<b>Defendants.</b>	(	

**TRUSTEE'S MOTION FOR ADDITIONAL  
TIME TO CLOSE ON REAL ESTATE TRANSACTION**

AND NOW comes Rosemary C. Crawford, Chapter 7 Trustee for the Bankruptcy Estate, by and through the law firm of Crawford McDonald, LLC, and files Trustee's Motion for Additional Time to Close on the Sale of Real Estate Transaction as follows:

- 1) Debtor filed for relief under Chapter 11 of the Bankruptcy Code on 09/29/2017.
- 2) This matter was converted to a Chapter 7 on 05/16/2018.
- 3) Rosemary C. Crawford was appointed and qualified as the Trustee upon the conversion of this case.

Trustee Johnson, Ronald Mot to Extend time for closing

- 4) This Honorable Court has jurisdiction pursuant to 28 U.S.C. §157.
- 5) This is a core proceeding within the meaning of 28 U.S.C. §157.
- 6) On 07/23/2019, Trustee filed an AMENDED COMPLAINT TO SELL DEBTORS AND NON-DEBTORS INTEREST IN REAL PROPERTY FREE AND DIVESTED OF LIENS at Adversary Case No. 19-02144-TPA.
- 7) The Debtor's spouse, Erica Fraser-Johnson, was a co-owner who still resides on the real estate being sold.
- 8) On 10/03/2019, at docket number 18, the Court approved Trustee's Amended Complaint to sell certain property located at 311 Eastern Parkway, Brooklyn, NY 11238 allowing thirty (30) days to close on the real estate transaction.
- 9) Said Order provided the Trustee with the opportunity to extend the sale deadline, which time has now expired.
- 10) There have been several complex issues, which arose during the closing process that require an additional extension of time – specifically, the Debtor's spouse, Erica Fraser-Johnson, has yet to vacate the property. The Trustee believes that an additional forty-five (45) days is necessary in order for Erica Fraser-Johnson to vacate the property, and that the transaction will properly close if the additional time is granted.
- 11) The extension of time is in the best interest of the Estate because resolving all issues will avoid undue liability.
- 12) The Trustee believes that the buyer, Harpia Asset Management LLC, has acted in good faith.

WHEREFORE, the Trustee prays that time to close on real estate be extended to by 45 days.

Dated: December 18, 2019

Respectfully submitted,  
/s/Rosemary C. Crawford  
Rosemary C. Crawford, Trustee  
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